

Exhibit B - Defendants' Final Proposed Claim Constructions and Evidence

Claim Term	Defendants' Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
<p>“servo drive”</p> <p>Claim 1(d)</p>	<p>A self-contained feedback system that controls mechanical movement</p>	<p>2:13-16; 4:4-14; 4:19-28; Fig. 2</p> <p>The prosecution file history for the '666 Patent (MC0001408), including MC0001409-1414 (Preliminary Amendment), MC0001473-1476 (Written Opinion of the Int'l Searching Authority), MC0001605-1607 (Amendments to the Claims), MC0001671-1673 (Notice of Allowability), as well as prior art cited therein.</p> <p>The prosecution file history for the German parent application to the '666 Patent, DE1020080565202 (MC0004283 and VINCENT_004194), including MC0004310-4333, VINCENT_004198-4216, VINCENT_004225-4249, VINCENT_004260-4265, as well as prior art cited therein.</p>	<p>Defendants may rely on expert testimony to explain the reasons a person having ordinary skill in the art (“PHOSITA”) at the time of the invention would have understood this term to be given the meaning provided herein. This may include testimony from Dr. Ben-Tzvi that a servo drive as understood by those in the field and in the context of the '666 patent refers to a self-contained feedback system that controls mechanical movement.</p> <p>Defendants may also rely on one or more of the following dictionary definitions produced as MC0006434, MC0006437, MC0006440, MC0006443, MC0006446, MC0006449, MC0006452, MC0006455, MC0006458.</p> <p>Defendants may also rely on the following cases:</p> <p><i>LaserDynamics, Inc. v. Asus Computer Int'l</i>, No. 2:06-CV-348 (TJW-CE), 2008 WL 3914095, at *5 (E.D. Tex. Aug. 18, 2008)</p> <p><i>Kamatani v. Benq Corp.</i>, No. CIV.A. 2:03-CV-437, 2005 WL 6217424, at *7 (E.D. Tex. June 29, 2005)</p>
<p>The “a coupling mechanism between the</p>	<p>A component connecting and positioned within the space</p>	<p>Abstract; 2:9-13; 2:20-21; 3:3-11; 3:39-59; Figs. 1a-1c; Figs. 4a-4d</p>	<p>Defendants may rely on expert testimony to explain the reasons a PHOSITA at the time of</p>

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<p>first hinge connection and the second hinge connection”</p> <p>Claim 1(e)</p>	<p>separating the first and second hinge connections</p>	<p>The prosecution file history for the '666 Patent (MC0001408), including MC0001409-1414 (Preliminary Amendment), MC0001473-1476 (Written Opinion of the Int'l Searching Authority), MC0001605-1607 (Amendments to the Claims), MC0001671-1673 (Notice of Allowability), as well as prior art cited therein.</p> <p>The prosecution file history for the German parent application to the '666 Patent, DE1020080565202 (MC0004283 and VINCENT_004194), including MC0004310-4333, VINCENT_004198-4216, VINCENT_004225-4249, VINCENT_004260-4265, as well as prior art cited therein.</p>	<p>the invention would have understood this term to be given the meaning provided herein. This may include testimony from Dr. Ben-Tzvi that in the context of the '666 patent and as understood by one of skill in the art the referenced coupling mechanism is a component connecting and positioned within the space separating the first and second hinge connections.</p> <p>Defendants may also rely on the following definitions for “coupling”:</p> <ul style="list-style-type: none"> - “connection”: “a device for connecting two parts or things” The Merriam-Webster Dictionary (2005), produced as MC0006359 - “[2] a device that serves to connect the ends of adjacent parts or objects” Webster’s Ninth New Collegiate Dictionary (1983), produced as MC0006371 - “...part for joining parts together” Webster’s New World College Dictionary Fourth Edition (2004), produced as MC0006374 - “to link together; connect” The American Heritage College Dictionary (2007), produced as MC0006356

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			<ul style="list-style-type: none"> - “[1b] a device for connecting parts of machinery” Illustrated Oxford Dictionary (1998), produced as MC006362 - “[2] a flexible or rigid mechanical device or part for joining parts together, as two shafts” (don’t like the shaft part) Webster’s New World Dictionary Third College Edition (1988), produced as MC0006377 - “[7] linkage” Random House Webster’s Unabridged Dictionary (2001), produced as MC0006365 <p>Defendants may also rely on the following definitions for “between”:</p> <ul style="list-style-type: none"> - “[2] in the interval separating”; “[adv.] in an intervening space or interval” ” The Merriam-Webster Dictionary (2005), produced as MC0006335 - “[2a] in the time, space, or interval that separates”; “[3c] separating from”; “[3b] serving to connect or unite in a relationship”; “[adv.] an intermediate space or interval” Webster’s Ninth New Collegiate Dictionary (1983), produced as MC0006347 - “in an intermediate space, position, or function” Webster’s New World College

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			<p>Dictionary Fourth Edition (2004), produced as MC0006350</p> <ul style="list-style-type: none"> - “[2] connecting spatially”; The American Heritage College Dictionary (2007), produced as MC0006332 - “[2] separating, physically or conceptually” Illustrated Oxford Dictionary (1998), produced as MC0006338 - “[1a] in the interval or position separating” Webster’s New College Dictionary Third Edition (2008), produced as MC0006344 - “[1] in or through the space that separates (two things)” Webster’s New World Dictionary Third College Edition (1988), produced as MC0006353 - “[1] in the space separating (two points, objects, etc.)”; “[3] linking, connecting”; Random House Webster’s Unabridged Dictionary (2001), produced as MC0006341
<p>“the threaded screw is supported on the drive shaft form fittingly and axially movable”</p> <p>Claim 1(f)</p>	<p>The threaded screw is able to move along the length (or axis) of the drive shaft in a straight line direction</p>	<p>Abstract; 1:36-44; 2:28-42; 2:44-51; 2:55-3:2; 3:60-4:8; Figs. 1-4</p> <p>The prosecution file history for the '666 Patent (MC0001408), including MC0001409-1414 (Preliminary Amendment),</p>	<p>Defendants may rely on expert testimony to explain the reasons a PHOSITA at the time of the invention would have understood this term to be given the meaning provided herein. This may include testimony from Dr. Ben-Tzvi that in the context of the '666 patent and as understood by one of skill in the art the threaded screw is able to move along the</p>

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		<p>MC0001473-1476 (Written Opinion of the Int'l Searching Authority), MC0001605-1607 (Amendments to the Claims), MC0001671-1673 (Notice of Allowability), as well as prior art cited therein.</p> <p>The prosecution file history for the German parent application to the '666 Patent, DE1020080565202 (MC0004283 and VINCENT_004194), including MC0004310-4333, VINCENT_004198-4216, VINCENT_004225-4249, VINCENT_004260-4265, as well as prior art cited therein.</p> <p>Certain portions of the nullity proceedings for the German parent application to the '666 Patent, DE1020080565202, specifically MC0003764 at -3773-3775; MC0003957 at -3964-3965; MC0004231 at -4249.</p>	<p>length (or axis) of the drive shaft in a straight line direction.</p> <p>Defendants may also rely on one or more of the following dictionary definitions produced as MC0006308, MC0006311, MC0006314, MC0006317, MC0006320, MC0006323, MC0006326, MC0006329.</p> <p>Defendants may also rely on the following definitions for "movable":</p> <ul style="list-style-type: none"> - "Possible to move." The American Heritage College Dictionary (2007), produced as MC0006419 - "1 move 1 : to change or cause to change position or posture 2 : to go or cause to go from one point to another" The Merriam-Webster Dictionary (2005), produced as MC0006422 - "that can be moved" Illustrated Oxford Dictionary (1998), produced as MC0006425 - "1. Capable of being moved" Webster New College (2008), produced as MC0006428 - "1: capable of being moved" Webster's Ninth New Collegiate Dictionary (1983), produced as MC0006431

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<p>“as well as guided in the axial direction by separate guidances”</p> <p>Claim 1(f)</p>	<p>Indefinite</p> <p>or in the alternative:</p> <p>At least two components designed to facilitate movement of the threaded screw along the length of the drive shaft.</p>	<p>Abstract; 1:36-44; 2:28-42; 2:44-51; 2:55-3:2; 3:60-4:8; Figs. 1-4</p> <p>The prosecution file history for the '666 Patent (MC0001408), including MC0001409-1414 (Preliminary Amendment), MC0001473-1476 (Written Opinion of the Int'l Searching Authority), MC0001605-1607 (Amendments to the Claims), MC0001671-1673 (Notice of Allowability), as well as prior art cited therein.</p> <p>The prosecution file history for the German parent application to the '666 Patent, DE1020080565202 (MC0004283 and VINCENT_004194), including MC0004310-4333, VINCENT_004198-4216, VINCENT_004225-4249, VINCENT_004260-4265, as well as prior art cited therein.</p> <p>Certain portions of the nullity proceedings for the German parent application to the '666 Patent, DE1020080565202, specifically MC0003764 at -</p>	<p>Defendants may rely on expert testimony to explain the reasons a PHOSITA at the time of the invention would have understood this term to be given the meaning provided herein. This may include testimony from Dr. Ben-Tzvi that the claim fails to inform, with reasonable certainty, those skilled in the art about the scope of the invention, given the confusion and lack of plain English in the specification to provide reasonable certainty as to the meaning of the claim, and particularly given Vincent's position that no movement is required. Dr. Ben-Tzvi may offer testimony that, in his opinion, the patent is indefinite and invalid. Dr. Ben-Tzvi may also offer as an alternative that the claim term indicates to one of skill in the art that at least two components that are designed to facilitate movement of the threaded screw along the length of the drive shaft are present in the device.</p> <p>Defendants may also rely on the following definitions for “guidance”:</p> <ul style="list-style-type: none"> - “the act or process of guiding” The American Heritage College Dictionary Fourth Edition (2007), produced as MC0006395; The Merriam-Webster Dictionary (2005), produced as MC0006398; Webster's Ninth New

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		3773-3775; MC0003957 at -3964-3965; MC0004231 at -4249.	<p>Collegiate Dictionary (1983), produced as MC0006410</p> <ul style="list-style-type: none"> - “the process of guiding or being guided” Oxford (1998), produced as MC0006401 - “4. Something that guides” Random House 2001, produced as MC0006404; Webster New World (1988), produced as MC0006416 - “an act or instance of guiding”, Webster New College (2008), produced as MC0006407 <p>Defendants may also rely on the following definitions for “guide:</p> <ul style="list-style-type: none"> - “[v. 2] to direct the course of; steer” The American Heritage College Dictionary Fourth Edition (2007), produced as MC0006395 - “[1] one who leads or directs another’s course; [2] one who shows and explains points of interest” The Merriam-Webster Dictionary (2005), produced as MC0006398 - “[1a] act as a guide to; lead or direct” Illustrated Oxford Dictionary (1998), produced as MC0006401 - “[3] to force (a person, object, or animal) to move in a certain path; [11] a device that regulates or directs progressive motion or action” Random House

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			<p>Webster's Unabridged Dictionary (2001), produced as MC0006404</p> <ul style="list-style-type: none">- "[4a] Something serving to indicate or direct; [4b] A device acting to regulate or direct a motion or operation" Webster's New College Dictionary Third Edition (2008), produced as MC0006407- "[2a] a device for steadying or directing the motion of something" Webster's Ninth New Collegiate Dictionary (1983), produced as MC0006410- "[1] to point out the way for; direct on a course; conduct; lead; [2] to direct the course or motion of (a vehicle, implement, etc.)" Webster's New World Dictionary Third College Edition (1988), produced as MC0006416 <p><i>See above definitions for "axial."</i></p>